

REMARKS

In the Office Action dated December 24, 2003, claims 72-85 were presented for examination. Claims 72-85 were rejected under 35 U.S.C. § 102(b) as being unpatentable over *Ouchi*.

Applicants wish to thank the Examiner for the careful and thorough review and action on the merits in this application.

I. Information Disclosure Statement

The Office Action Summary did not make an acknowledgment of Applicant's receipt of an Information Disclosure Statement filed with the U.S. Patent and Trademark Office on August 28, 2000. Acknowledgement of receipt of the Information Disclosure Statement is respectfully requested in the next communication.

II. 35 U.S.C. §102(b) - Anticipation by *Ouchi*

Claims 72-85 were rejected under 35 U.S.C. §102(a) as being unpatentable over *Ouchi*, U.S. Patent No. 6,539,404.

The *Ouchi* patent relates to a workflow management system in a computer readable medium. More specifically, the workflow is an electronic mail message based system for processing a document. The electronic mail message follows a route in the form of a sequence of email addresses. A user in the system opens a received electronic mail message, processes the document attached to the message, and then sends the electronic mail message to a route manager that controls routing of the message from the user. Accordingly, *Ouchi* is a patent that provides a workflow for a document through an electronic mail messaging route.

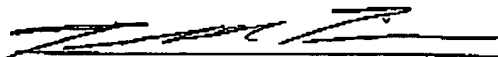
Applicant's invention differs from the disclosure of *Ouchi*. Applicant's invention is an article implementing lead management for a marketing campaign. As clearly stated in claims 86-99, which replace claims 72-85, Applicant's article is implemented in a computer readable medium with records of lead contact information, and stations defining the status of the leads in the campaign. A set of rules are applied to the marketing campaign. Each lead is assigned to a station, and each lead is moved to a subsequent station in response to a reaction of the lead while assigned to the prior station. The marketing campaign defines a set of rules for each station in the form of marketing activities to be conducted on the lead in a specific station. The progress of the lead, including any reactions to the marketing efforts in any station, is monitored. *Ouchi* does not relate to an electronic database system for managing a marketing campaign. In fact, *Ouchi* is essentially an electronic mail communication system for making changes to an attached document. The workflow of *Ouchi* is neither a marketing campaign nor is it intended for use with a marketing campaign. Rather the workflow of *Ouchi* places a document on a route, wherein the route is defined as a series of users in a workflow, with each user being responsible for overseeing or amending a document attached to an electronic mail message. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP §2131 (citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F. 2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987)). As mentioned above, *Ouchi* does not show all of the elements as claimed by Applicant in replacement claims 86-99. Specifically, *Ouchi* does not suggest or teach a lead being managed in a database record in a marketing campaign adapted to be processed through a set of rules for the campaign. Therefore, *Ouchi* fails to teach all the claim limitations present in Applicant's claimed invention. Accordingly, removal of the rejection of claims 72-85 under 35 U.S.C. §102(e) as being anticipated by *Ouchi* and allowance of claims 86-99 is respectfully requested.

In light of the foregoing amendments and remarks, all of the claims now presented are in condition for allowance, and Applicants respectfully request that the outstanding rejections be withdrawn and this application be passed to issue.

The Examiner is urged to call the undersigned at the number listed below if, in the

Examiner's opinion, such a phone conference would aid in furthering the prosecution of this application.

Respectfully submitted,



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